

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AMERICAN CIVIL LIBERTIES UNION, )  
OF MASSACHUSETTS; and )  
AMERICAN OVERSIGHT, )  
Plaintiffs, )  
v. ) C.A. No. 19-10916-NMG  
UNITED STATES DEPARTMENT OF )  
HOMELAND SECURITY, )  
Defendant. )

## AMENDED STATUS REPORT<sup>1</sup>

On August 7, 2019, this Court issued an order that the Defendant, United States Department of Homeland Security ("DHS"), respond to Plaintiffs' Freedom of Information Act ("FOIA") request on or before September 4, 2019 and set a status hearing for 3:00 p.m. for September 4, 2019 should the DHS fail to serve such a response.

On September 3, 2019, after further review of the requested 2018 Border Security Improvement Plan ("Plan") by the respective proper authorities, the DHS served a full copy of the 86 page Plan on Plaintiffs, with only certain redactions taken under Exemption (b)(7)(E). Since the DHS has served a response, a status conference is not necessary.

<sup>1</sup> Defendant also informs this Court that on September 3, 2019 it served a Vaughn index contemporaneously with its service of the Plan on Plaintiff.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the NEF.

/s/ Michael Sady  
Michael Sady  
Assistant U. S. Attorney

Dated: September 4, 2019